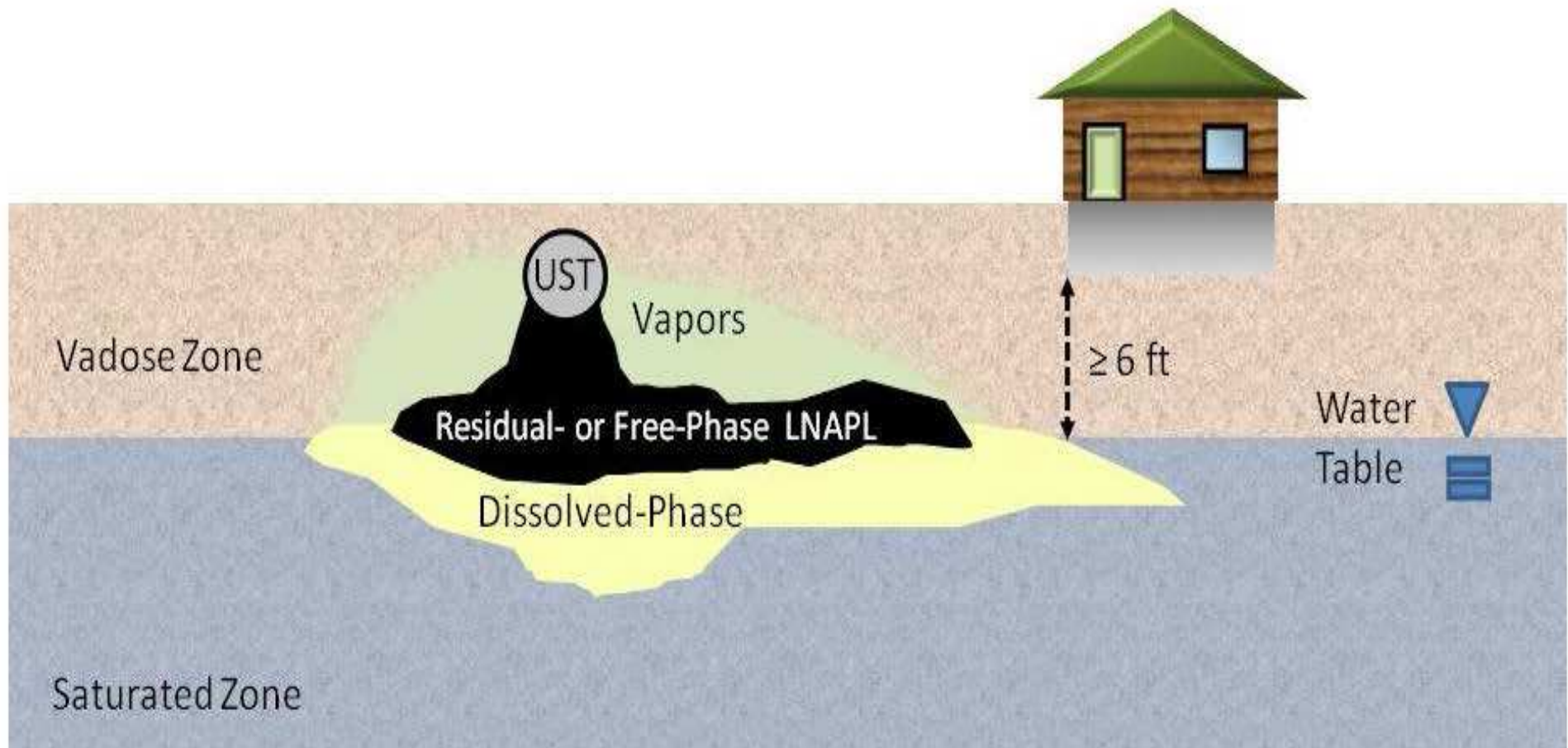


Overview of EPA OUST PVI Guidance

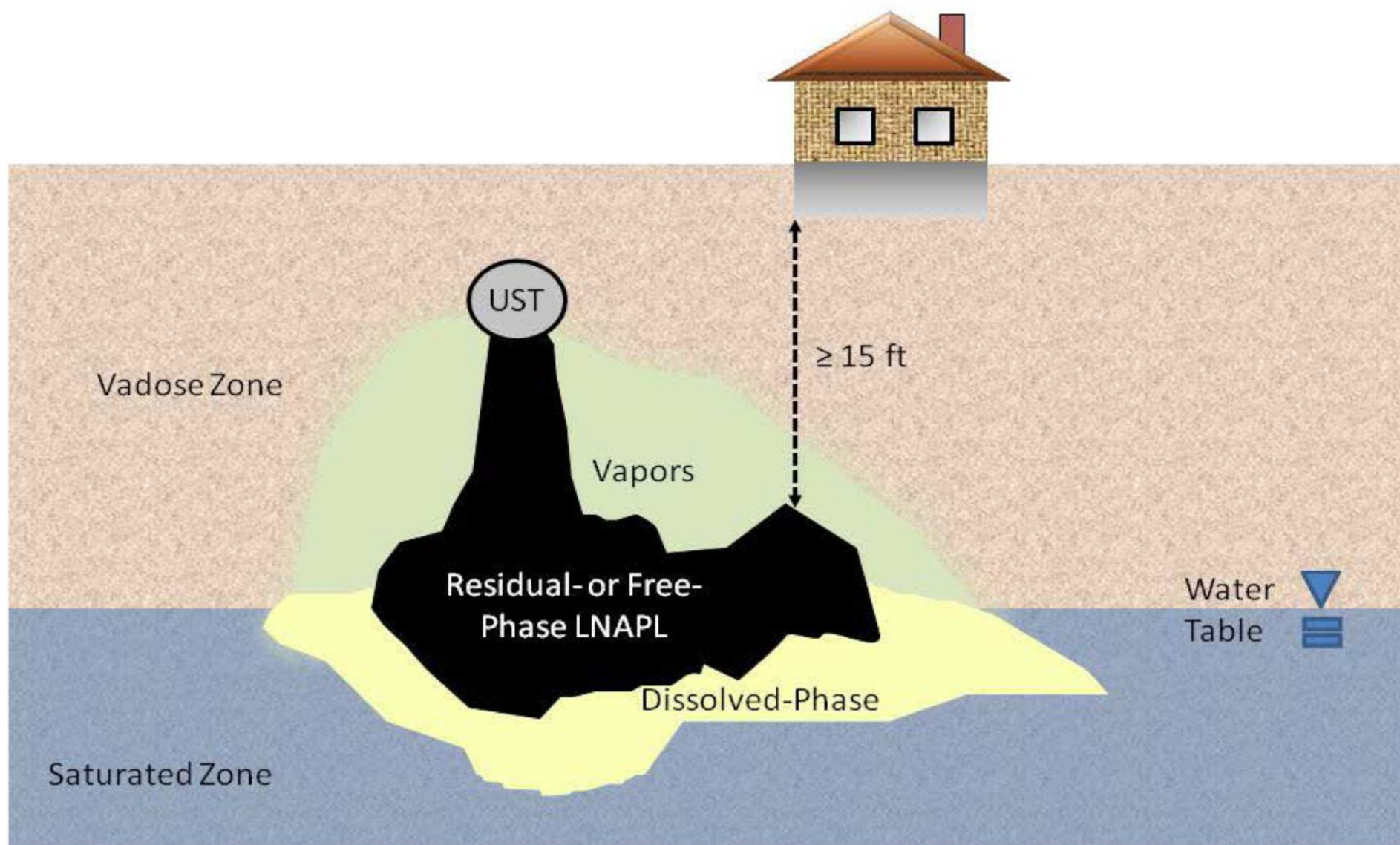


- Issued Draft Guidance Document: April 2013
- Comments accepted up to: June 1, 2013
- Draft Document:
<http://www.epa.gov/oust/cat/pvi/petroleum-vapor-intrusion-review-draft-04092013.pdf>
- Release Date: 2014?
- Contains useable exclusion criteria
- Should be used for all petroleum release sites
- Based on extensive review of petroleum site data bases
- Will soon have Bioscreen (EPA version of Biovalor)

Vertical Separation Distance: Dissolved Phase



LNAPL Vertical Separation Distance



Lateral Separation for Exclusion



“lateral separation distance is on the same scale as the vertical separation distance “

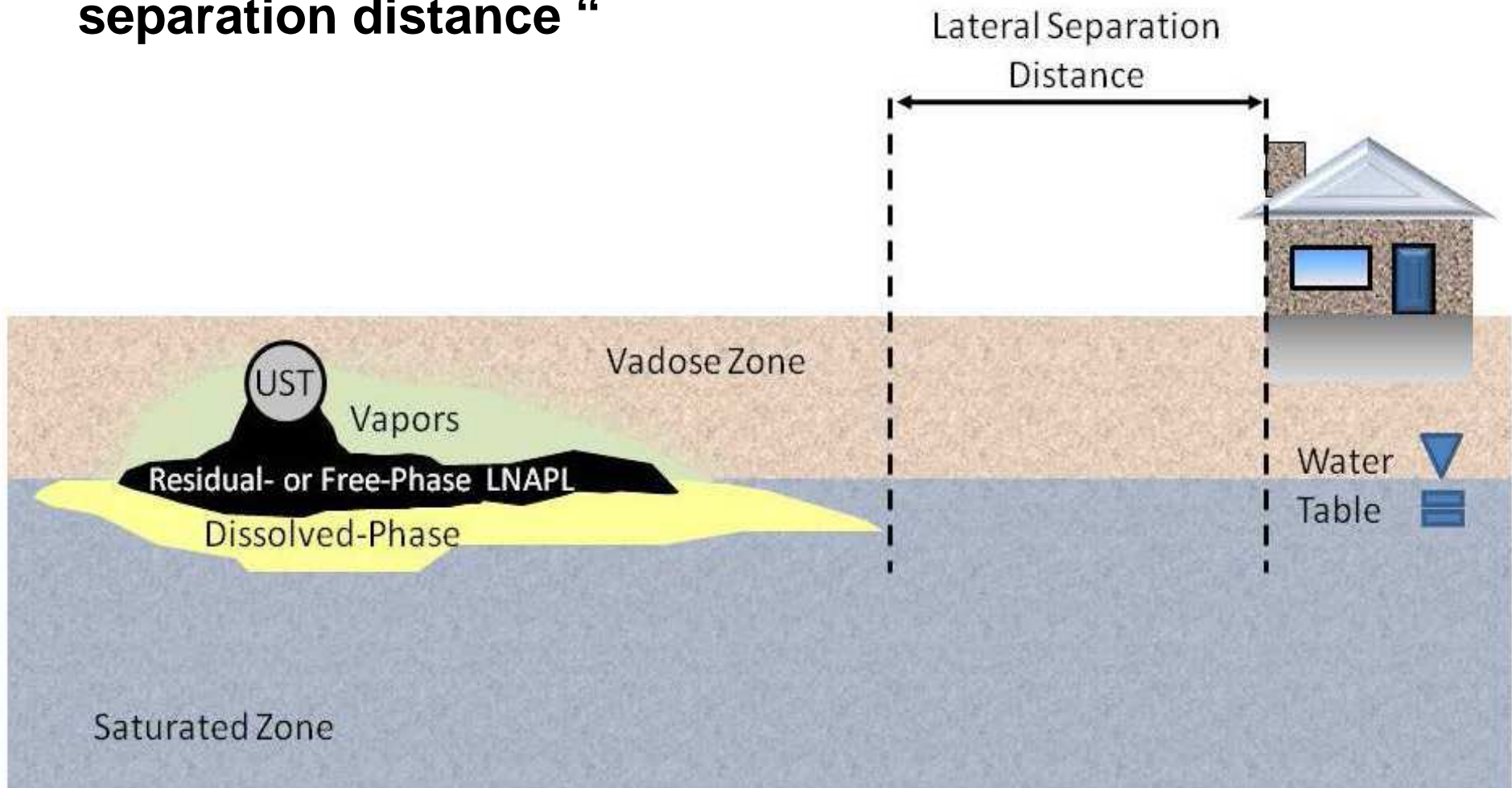


Table 3. Recommended Vertical Separation Distance Between Contamination And Building Foundation, Basement, Or Slab.



| Media | Benzene | TPH | Vertical Separation Distance (feet)* |
|--------------------|----------------|-----------------|--------------------------------------|
| Soil (mg/kg) | ≤10 | ≤250 | 6 |
| | >10 (LNAPL) | >250 (LNAPL) | 15** |
| Groundwater (ug/L) | ≤ 5,000 | ≤30,000 | 6 |
| | >5,000 (LNAPL) | >30,000 (LNAPL) | 15** |

API Comments to EPA (OUST & OSWER)



- OSWER and OUST documents not consistent for PVI
- Recommend all PVI sites use the OUST guide
- OSWER guidance recommends excessive and multiple sampling including subslab and indoor air



Other Comments (OUST & OSWER).....



Taken at face value, the “guidance” provided in this document would make it virtually impossible to reach a no further action decision at any site with volatile contaminants present in the subsurface

The biggest problem is that all of the recommendations are wishy-washy and heavily caveated, making them useless. In my 18+ years working as an environmental consultant, I have never read a guidance document as poorly constructed as this one.



The biggest problem I see with this document is that if the site does not screen out from the criteria in Table 3, then the user is told repeatedly to collect soil gas or sub-slab soil gas data. But there are no guidelines/benchmarks given to interpret the soil gas data.



Michigan and PVI: December 2013



- **Currently found as Attachment B.3 of the Guidance Document**
- **Provides alternative approaches to demonstrate the volatilization to indoor air pathway does not pose a risk to a building**
 - **More Details provided by Matt Williams later**